

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.  
OTTOMOTTO LLC, OTTO TRUCKING  
LLC

Defendants

Case No. 3:17-cv-00939-WHA

**[PROPOSED] ORDER APPROVING  
DEFENDANT’S MOTION TO MODIFY  
THE INTERIM MODEL PROTECTIVE  
ORDER**

Defendant Uber Technologies, Inc. (“**Uber**”) filed a Motion<sup>1</sup> to modify paragraph 7 of the Interim Model Protective Order in the above-captioned matter (the “**Protective Order**”) to allow the parties to the bankruptcy proceeding entitled, *Anthony Levandowski v Uber Technologies, Inc.*, N.D. Cal. Bankr., Adv. Pro. No. 20-03050 (HLB) (the “**Adversary Proceeding**”) to (a) review the Protected Materials for the purpose of evaluating whether they are relevant to the Adversary Proceeding and (b) use (and produce in discovery) such materials for prosecuting, defending, and attempting to settle the Adversary Proceeding, pursuant to a substantially identical Adversary Proceeding Protective Order. Upon consideration of the Motion and good cause shown,

<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

1           1.       Uber's Motion is **GRANTED**.

2           2.       Section 7 (including subsections 7.1 through 7.4) of the Protective Order entered in  
3 this case is modified to allow the parties to the Adversary Proceeding to (a) review the Protected  
4 Materials for the purpose of evaluating whether they are relevant to the Adversary Proceeding, and  
5 (b) use (and produce in discovery) such materials for prosecuting, defending, and attempting to settle  
6 the Adversary Proceeding, pursuant to the Adversary Proceeding Protective Order. All  
7 confidentiality designations made in this Litigation shall apply as though they had been made in the  
8 Adversary Proceeding, unless the Designating Party revises the designation or the designation is  
9 challenged pursuant to the terms of the Adversary Proceeding Protective Order.

10 **IT IS SO ORDERED:**

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12 Dated: December \_\_\_\_, 2020

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13 HON. WILLIAM H. ALSUP  
14 United States District Court Judge  
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